

FREEMAN LAW FIRM, INC.

1107 ½ Tacoma Avenue South – Tacoma, WA 98402
Tel: 253.383.4500 – fax: 253.383.4501 – sfreeman@freemanlawfirm.org

December 5, 2018

Via Email to
newcases.tacoma@wawd.uscourts.gov

Clerk of the Court
United States District Court
Western District of Washington
1717 Pacific Ave.
Tacoma, Washington 98402

Re: *Request for DMCA Subpoena to Cloudflare, Inc.*

Dear Clerk of the Court:

Petitioner AMA Multimedia, LLC (“AMA”), through its undersigned counsel of record, hereby respectfully requests that the Clerk of this Court issue a Subpoena pursuant to 17 U.S.C. § 512(h) to service provider Cloudflare, Inc. to identify alleged infringers of AMA’s copyrighted material.

AMA is the owner of numerous copyrighted audiovisual works. In the course of protecting its works, AMA has determined that infringing copies of these works, posted at the direction of individual users and without authorization from AMA, appear on a website controlled by Cloudflare, “yourporn.sexy.” Such infringements have been ongoing and AMA has issued numerous DMCA notifications to Cloudflare’s DMCA Agent. All notifications have met the requirements of 17 U.S.C. § 512(c)(3)(A) by setting forth, *inter alia*, a representative list of the copyrighted works that have been infringed and the identification and location on Cloudflare’s website of the infringing material. AMA now seeks to obtain a DMCA Subpoena to learn the identity of the individuals who are posting the infringing content.

In order to fully comply with 17 U.S.C. 512(h) DMCA Subpoena requirements, the following items are submitted concurrently with this letter request:

- Copy of one notification sent to Cloudflare’s DMCA Agent (attached as Exhibit A to the Declaration of Jason Tucker and Exhibit B to the DMCA Subpoena);
- DMCA Subpoena (proposed); and

Clerk of the Court
December 5, 2018
Page 2 of 2

- Sworn Declaration of Jason Tucker, authorized agent of AMA, confirming that the purpose of the DMCA Subpoena is to obtain the identity of the alleged infringers for the single purpose of protecting AMA's rights under Title 17 of the United States Code.

With all conditions for issuance of the DMCA Subpoena having been met, AMA therefore petitions the Clerk to issue and sign, in accordance with 17 U.S.C. § 512(h)(4), the proposed DMCA Subpoena, and return it to the undersigned requester for delivery to the service provider, Cloudflare, Inc. We understand that the fee for this filing is \$47.00 and will await word from you as to making payment therefor.

Best regards,



Spencer D. Freeman

SDF:dmjp

Attachments:

- Proposed DMCA Subpoena
- Sworn Declaration
- Notifications of Claimed Infringements
(attached to Subpoena and Declaration)